

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

VILLAGE ON THE BAYOU, INC	*	CIVIL ACTION NO: 3:21-CV-03644
	*	
VERSUS	*	JUDGE TERRY A. DOUGHTY
	*	
STATE FARM FIRE & CASUALTY INSURANCE CO.	*	MAG. JUDGE KAYLA D. MCCLUSKY
	*	

**PLAINTIFF’S MOTION TO EXCLUDE THE REPORT AND TESTIMONY OF
DEFENDANT’S EXPERT, DAVID A. BELL.**

NOW INTO COURT, through undersigned counsel, comes Plaintiff, Village on the Bayou, Inc. (“VOTB”), and hereby moves this Honorable Court for an Order excluding from trial the report and testimony of Defendant’s expert, David A. Bell, under Rule 7022 and 703 of the Federal Rules of Evidence and *Daubert v. Merrell Dow Pharmaceuticals, Inc.*, 509 U.S. 579, 113 S.Ct. 2786 (1993) and *Kuhmo Tire Co. v. Carmichael*, 526 U.S. 137, 119 S.Ct. 1167 (1999). A memorandum in support of this motion is filed contemporaneously herewith.

RESPECTFULLY SUBMITTED:

/s/ Trent J. Moss
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CERTIFICATE OF SERVICE

I hereby certify that on December 5, 2022, I have electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Trent J. Moss

Trent J. Moss